

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Case No.</b> 19-24274-GLT
Kristal C. Owens f/k/a	)
Kristal C. Owens-Gayle,	) <b>Chapter</b> 11
<b>Debtor,</b>	)
OPA-HI DEVELOPMENT LLC.,	) <b>Related Document No.</b> 277-276
<b>Movant,</b>	)
<b>vs.</b>	) <b>Hearing Date:</b> 01/07/2021 @ 10:00 a.m.
Kristal C. Owens f/k/a	) <b>Response Due:</b> 12/28/2020
Kristal C. Owens-Gayle,	)
<b>Respondents.</b>	) <b>Document No.</b>

**LIMITED RESPONSE OF DEBTOR TO MOTION TO PAY "BREAK-UP FEE"**

**AND NOW**, comes the Debtor, Kristal C. Owens, by and through her attorneys, Calaiaro Valencik and files this limited response and in support thereof avers as follows:

1. The Debtor admits and agrees with the averments in the Movant's motion.
2. The Debtor consents to the relief requested that the Movant is entitled to the break-up fee of \$1,780.25.

**WHEREFORE**, the Debtor requests this Honorable Court enter the Movant's proposed order.

**Respectfully Submitted,**

**Dated:** December 15, 2020

**BY:** /s/ Donald R. Calaiaro  
**Donald R. Calaiaro, Esquire**  
**PA I.D. No. 27538**  
[dcalaiaro@c-vlaw.com](mailto:dcalaiaro@c-vlaw.com)  
**CALAIARO VALENCIK**  
**938 Penn Avenue, Suite 501**  
**Pittsburgh, PA 15222-3708**  
**(412) 232-0930**

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**CERTIFICATE OF SERVICE OF LIMITED RESPONSE OF DEBTOR TO MOTION TO  
PAY "BREAK-UP FEE"**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 15, 2020.

**SERVICE BY NEF:**

Jennifer L. Cerce on behalf of Creditor, Wilkinsburg School District and Borough of Wilkinsburg,  
jlc@mbm-law.net  
Jeffrey R. Hunt on behalf of Creditor, County of Allegheny, jhunt@grblaw.com;  
cnoroski@grblaw.com  
Jill Locnikar on behalf of Creditor United States of America Dep of Treasury, Internal Revenue  
Service, jill.locnikar@usdoj.gov  
Larry E. Wahlquist on behalf of US Trustee Office of the United States Trustee,  
larry.e.wahlquist@usdoj.gov  
Brett Solomon on behalf of Interested Party OPA-Hi Development LLC,  
brett.solomon@solomon-legal.com

**SERVICE BY FIRST CLASS MAIL:**

Wells Fargo Home Mortgage, P.O. Box 10335, Des Moines, IA 50306  
Brian H. Smith, Law Offices of Lamm Rubenstone LL, 3600 Horizon Boulevard, Suite 200,  
Feasterville Trevose, PA 19053

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

**EXECUTED ON:** December 15, 2020

/s/ Donald R. Calaiaro

**Donald R. Calaiaro, Esquire**  
**PA I.D. No. 27538**  
**[dcalaiaro@c-vlaw.com](mailto:dcalaiaro@c-vlaw.com)**  
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